



Liza M. Walsh
Direct Dial: (973) 757-1101
lwalsh@walsh.law

THREE GATEWAY CENTER
100 Mulberry St, 15th Floor
Newark, NJ 07102
T: 973.757.1100
F: 973.757.1090
WALSH.LAW

April 11, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court, District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut Street
Newark, NJ 07101

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS (MDL No. 3080)
Supplemental Briefing on Constructive Notice**

Dear Judge Martinotti,

This firm, together with Jones Day, represents Defendant Sanofi-Aventis U.S. LLC in the above-referenced action. We write on behalf of all parties regarding the Court's order requiring supplemental briefing on the issue of constructive notice.

As directed by the Court, the parties will submit initial briefs on May 2, 2025, and response briefs on May 16, 2025. Plaintiffs and Defendants can respectively submit an initial brief or briefs of up to 30 cumulative pages (to be allocated as they see fit), and a response brief or briefs of up to 20 pages (to be allocated as they see fit). The briefs will be in 12-point font Times New Roman. The parties will electronically file their respective briefs no later than 5:00 PM on each date.

We appreciate the Court's consideration of this submission and ongoing attention to this matter. Should Your Honor find this proposal acceptable, we respectfully request the letter be "So Ordered" and entered on the docket.

Respectfully submitted,

/s/ Liza M. Walsh

Liza M. Walsh

cc: Counsel of Record (via ECF)

IT IS on this _____ day of _____, 2025,
SO ORDERED.

Hon. Brian R. Martinotti, U.S.D.J.